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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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| In the Matter of |) | |
| |) | |
| Federal-State Joint Board on |) | CC Docket No. 96-45 |
| Universal Service |) | |
| |) | |
| Access Charge Reform |) | CC Docket No. 96-262 |

COMMENTS

BELLSOUTH CORPORATION

M. Robert Sutherland
Richard M. Sbaratta

Its Attorney

No. of Copies rec'd
List ABCDE

CITG

Suite 1700
1155 Peachtree Street, N. E.
Atlanta, Georgia 30309-3610
(404) 249-3386

Date: July 23, 1999

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COMMENTS

BellSouth Corporation, on behalf of itself and its subsidiaries ("BellSouth"), hereby submits its comments on the *Further Notice of Proposed Rulemaking* ("FNPRM") regarding the implementation of a new federal universal service fund.¹

I. INTRODUCTION AND SUMMARY

1. An essential component of the Telecommunications Act of 1996 (the "Act") is the mandate that the Commission create an explicit, federal fund to support and preserve universal service. The Act's mandate represents a significant, but necessary, departure from the historical approach of supporting universal service through implicit subsidies embedded in rates for a variety of telecommunications services. Under the competitive environment fostered by the Act, universal service support in the form of implicit subsidies cannot survive.

2. The Act challenged the Commission, together with the Federal-State Joint Board, to craft a new approach to universal service support that would assure affordable telephone service at reasonably comparable rates across the nation. While the principles and objectives that define the new, federal universal service are clear, defining and implementing mechanisms

¹ *In the Matter of Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, *Further Notice of Proposed Rulemaking*, FCC 99-119, released May 28, 1999.

that advance the purposes of the Act have been and continue to be a formidable task. The transformation of universal service support from implicit subsidy to explicit subsidy has been difficult. There was no pattern to follow or recipe for success.

3. In the uncertain circumstances in which the new universal service mechanism continues to unfold, the Commission has relied on the Federal-State Joint Board to assist it in crafting an approach that contributes to the achievement of the statute's goals. As a result, the new mechanism, set forth in the Commission's most recent order,² reflects a substantial modification from the original concept adopted two years ago.³ The *Seventh Report and Order* is in response to the Joint Board's *Second Recommended Decision*.⁴ The *Second Recommended Decision* brought focus to the universal service inquiry. It differentiated between the implicit support contained in interstate access charges from the additional explicit support that states should be afforded through a new, federal universal service fund that is necessary to ensure reasonably comparable intrastate rates. The Joint Board's *Second Recommended Decision* limited itself with the latter component of universal service support as does the mechanism created by the Commission's *Seventh Report and Order*.⁵ Accordingly, the new mechanism represents a positive step towards fulfilling part of the Commission's statutory obligations

² *In the Matter of Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, *Seventh Report and Order and Thirteenth Order On Reconsideration*, FCC 99-119, released May 28, 1999 ("Seventh Report and Order").

³ *In the Matter of Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, *Report and Order*, 12 FCC Rcd 8776 (1997), *appeal pending sub nom. Texas Office of Public Utilities Counsel v. FCC*, No. 97-60421 (5th Cir. argued Dec. 1, 1998).

⁴ *In the Matter of Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, *Second Recommended Decision*, 13 FCC Rcd 24744 (1998) ("*Second Recommended Decision*").

⁵ The implicit support embedded in access charges is a matter that the Commission continues to have under advisement and which is being addressed attendant with access charge reform.

regarding universal service. Although work remains to be done in identifying and removing implicit support contained in interstate access charges, the framework for the new federal mechanism is decided and the Commission is close to finalizing its plan as it relates to creating a federal fund to assure nationwide affordable universal service at reasonably comparable rates.

4. It is important to move forward and gain experience under a new federal mechanism. Experience will be the true test of the adequacy of the support mechanism and its components. The proposed mechanism includes a hold-harmless provision that is intended to function as a transition measure while the Commission and the states gain further experience under the new federal mechanism. The Commission stated its intention to revisit the transition mechanism within the next three years to determine whether it is still necessary.⁶ Such determination will require a review of the federal universal service fund mechanism as a whole in order to assure that the fund mechanism is operating as intended and achieving the Commission's goals.

5. Sound public policy demands such a review. Although the framework of the new federal fund has been laid out, the details remain to be decided. Absent these details, neither the Commission nor any party can predict with certainty that the new fund will operate as intended. Therefore, it is both appropriate and necessary to evaluate the fund and its component parts within a reasonable period after it has been in operation to determine if it functions as expected and achieves the objectives of the Commission and the Joint Board. The three-year deadline for reviewing the hold-harmless measure will serve well for reviewing the fund in its entirety.

⁶ *FNPRM* ¶ 14.

II. IMPLEMENTATION ISSUES

A. The Benchmark

6. BellSouth supported the Joint Board's recommendation that the Commission employ a cost benchmark in order to determine whether a particular area had costs that were significantly above the national average. While the Commission adopted the Joint Board's recommendation regarding the use of a cost benchmark,⁷ it seeks further comment on the appropriate level within which the national benchmark should fall.

7. The current high cost mechanism for large carriers provides support to carriers whose loop costs are greater than 115 percent of the national average. The Joint Board, in its *Second Recommended Decision*, suggested the Commission consider using a range between 115 percent and 150 percent of the national weighted average cost per line.⁸ In the absence of final cost model parameters, inputs and results, it is difficult to target precisely the appropriate national benchmark.

8. There are two considerations that appear to bear heavily on the benchmark for the initial federal fund. The first consideration is the Commission's expectation that the size of the new federal fund will not be significantly different from the size of the existing high cost fund. Irrespective of whether constraining the size of the new federal fund at the outset is an appropriate initial step, such constraint operates to limit the selection of the benchmark. Setting a benchmark that is at the low end of the range suggested by the Joint Board, for example, would likely increase the size of the fund beyond that which exists today. The second consideration is

⁷ *Seventh Report and Order* ¶ 61.

⁸ *Second Recommended Decision*, 13 FCC Rcd at 24761, ¶ 43.

the hold-harmless measure of the new fund. Even if the benchmark is initially established at a level that is too high, the hold-harmless measure acts to compensate for the miscue.

9. Taking into account these two considerations, the only other guidance comes from the preliminary outputs of the model platform that have been developed in the process of testing the model and evaluating data inputs. The Joint Board's proposal, adopted by the Commission, to utilize a two-step process to determine the amount, if any, of additional federal high cost support a state should receive for the purposes of maintaining rate comparability is unnecessary if the Commission elects to use study area costs. Instead of trying to determine a state's ability to fund universal service as a means of limiting the size of the federal fund, the Commission would need only to adjust the cost benchmark. By increasing the benchmark, the state implicitly would become responsible for a greater portion of support for universal service.

10. If the support is disaggregated to at least the unbundled network element ("UNE") level, then there might be a need to specify additional criteria to differentiate between states. While the simplest approach would be to dispense with the additional criteria, BellSouth recognizes that the Commission may not want universal service funds dispersed to states that have numerous low cost areas and very few high cost areas. To the extent the Commission is concerned with the size of the federal fund calculated at a disaggregated level, then the benchmark could be adjusted upward to reduce the size of the fund. In Exhibit 1 attached hereto, BellSouth has calculated illustrative fund sizes based on different levels of aggregation and different benchmark levels. As this Exhibit shows, varying the benchmark level is an

administratively efficient means available to the Commission to adjust the fund size regardless of the level of aggregation.⁹

B. Level Of Disaggregation

11. Another outstanding issue relates to the level of disaggregation at which costs for universal service should be calculated and compared to the benchmark for the purposes of determining support. The Commission seeks comments on whether the federal support mechanism should calculate support levels by comparing costs at (1) the wire center level; (2) the UNE cost zone level; or (3) the study area level.¹⁰

12. While the objective of the universal service fund is to maintain affordable local service at rates that are reasonably comparable in all regions, the Commission also seeks to bring competition to local telephone markets.¹¹ To assure that both objectives are achieved, it is essential that costs be disaggregated below the study area level. At a minimum, the UNE cost zone should be employed. If universal service support mechanism does not disaggregate costs at least to the UNE cost zone level, then the inconsistency between the Commission's interconnection rules and universal service rules creates the opportunity for uneconomic arbitrage.

13. The Commission has correctly observed that calculating support levels using disaggregated costs has two benefits.¹² It ensures that adequate support is provided to areas, and hence subscribers, that need support. Also, deaveraged support, which is portable among all

⁹ Alternatively, the Commission could fix the benchmark but vary the percentage of the cost above the benchmark that will be supported by the federal fund.

¹⁰ *FNPRM* ¶102.

¹¹ *Id.* ¶ 103.

¹² *Id.*

eligible telecommunications, could encourage efficient competitive entry in high cost areas, rather than just in low cost or urban areas. In contrast, if support were calculated at an aggregate study area level, such support would be insufficient in high cost areas within the study area and excessive in the low cost parts of the study area. Such a result distorts the competitive marketplace, discouraging entry in high cost areas and providing new entrants with non-economic incentives and advantages in providing service only in low cost areas.

14. Accordingly, the Commission should reject calculating support at the study area level. From BellSouth's perspective, both UNE zone and wire center levels of disaggregation would achieve the benefits the Commission expects from using a disaggregated cost level. The cost model should be capable of accommodating UNE zones.¹³ While state commissions are responsible for developing UNE zones, as the Commission has recognized the states will develop boundaries based on local conditions including cost.¹⁴ It would be surprising, then, if such boundaries do not correspond to groups of wire centers.

15. The Commission expresses concern that calculating support at a disaggregate level, *i.e.*, below the study area, could result in a significant increase in the total universal service support amounts. To counteract such a possibility the Commission reviews a variety of alternatives that calculates total support at the study area level but then uses the costs at a disaggregate level to distribute study area support to wire centers or UNE zones. It is inappropriate to use the level of cost aggregation as a mechanism to limit the size of the federal

¹³ Should UNE zones be used to calculate support, the Commission must recognize that the fund size will increase as states implement UNE zones. Further, the Commission should make clear that a state's ability to receive universal service fund support is not dependent on implementing UNE zones by January 1, 2000.

¹⁴ *Id.* ¶104.

universal service fund. The two primary factors that should be considered by the Commission in determining the level of disaggregation are: (1) that the model provides support to high-cost areas within a study area; and (2) that the support mechanism is competitively neutral and does not afford uneconomic arbitrage opportunities.

16. The appropriate level of disaggregation is unrelated to the size of the universal service fund. Indeed, the Commission's preliminary determination that the amount of the fund should not exceed current support levels is a political and policy determination, not a cost consideration. To the extent the Commission acts to limit the size of the fund, it should rely on mechanisms other than the level of disaggregation for such purpose. For example, altering the benchmark level is a far simpler and more efficient means by which to size the federal universal service fund. Certainly, neither the Commission nor the industry would care to be in the position of changing the level or method of disaggregation each time the fund size was to be adjusted--particularly, when early experience under the new universal service fund mechanism may indicate that adjustments are warranted.

C. Distribution And Application Of Support

17. To the extent that states currently receive high-cost support, intrastate rates already reflect the impact of federal universal service support. The new federal fund will replace the existing mechanism but not the existing support. The hold-harmless measure incorporated into the new mechanism assures that states will not receive less support than is currently received under the existing high-cost mechanism. Accordingly, it is only the universal service support that exceeds the hold-harmless amount that constitutes new support for universal service and could be used to offset intrastate rates.

18. The Commission should not direct the manner in which the states incorporate universal service fund support into intrastate ratemaking. There is no single approach that states have used to maintain reasonable affordable universal service. Accordingly, there is no single approach that could be mandated for states to reflect the receipt new universal service support.

19. It should be sufficient that states that have carriers receiving funds from the federal universal service fund (in excess of hold-harmless funds) acknowledge that they will require carriers to adjust intrastate rates that contain implicit subsidies. States should also acknowledge that to the extent federal universal service support decreases, they would permit carriers to adjust intrastate rates to compensate for the loss of support.¹⁵ While in the long-run federal universal service support should be stable and predictable, in the near term, there may be some volatility in the size of the federal fund and to whom the new federal fund is distributed. Thus, states must be prepared to see intrastate rates increase and decrease accordingly.¹⁶

D. Hold-Harmless

20. The Commission seeks comment on whether hold-harmless amounts should be implemented on a state-by-state basis or on a carrier-by-carrier basis. BellSouth believes that the purpose of the hold-harmless mechanism can be best achieved through implementation on a carrier-by-carrier basis (by state). The existing universal service fund amounts, which the hold-harmless mechanism is intended to emulate, were determined on a carrier-by-carrier basis. Further, carriers that have received high cost support have adjusted their specific rates to reflect

¹⁵ States, of course, would remain free to create or adjust explicit intrastate universal service funds as a means of compensating for reductions in federal universal service support.

¹⁶ The Commission is following a conservative implementation strategy that should minimize the possibility of a seesaw federal universal service fund.

such support. Accordingly, it would be inappropriate to shift the hold-harmless support to an area different than the one served by the carrier that had been receiving high cost support.

21. The Commission expresses concern with a carrier-by-carrier approach because it believes that such an approach could increase the size of the new federal fund as compared to the size that a state-by-state approach might yield. This concern, however, is overshadowed by the purpose of the hold-harmless mechanism. Recognizing the uncertainty regarding the new forward-looking federal fund approach, the hold-harmless mechanism prevents serious and abrupt dislocations that might otherwise occur. To achieve this objective, the Commission must consider the means by which existing universal service support has been determined and reflected in intrastate rates. Existing universal service support is provided on a carrier basis and reflected in the recipient carrier's rates. If that approach is abandoned with the implementation of the hold-harmless mechanism, then the potential disruption that the Commission seeks to avoid can still occur. A carrier that loses existing federal support but is still required to provide the same services will have to adjust the rates that the high cost fund had been supporting.

22. The hold-harmless mechanism is intended only to be a transition mechanism. It should not be used to constrain the overall size of the new federal universal service fund. To do so dilutes its primary purpose and increases the prospect that implementation of a new fund will bring with it volatility.

23. The hold-harmless amount should be portable to any eligible telecommunications carrier serving the customer in a supported area. The hold-harmless amount should also remain certain during the transition period so that any eligible carrier will know the amount of support available in a given area.

E. Adjusting Interstate Access Charges To Account For Explicit Support

24. In the *FNPRM*, the Commission recognizes that there are many sources of implicit support contained in access charges.¹⁷ The universal service provisions of the Act require that the Commission make explicit the existing implicit support contained in interstate access charges.¹⁸ In the *FNPRM*, the Commission is considering how interstate access charges should be reduced once it identifies and makes explicit the existing implicit support.

25. BellSouth agrees with the Commission that interstate access rates should be reduced to reflect any additional explicit support the Commission creates as a replacement for existing implicit support. The amount of any such reduction for price cap carriers would be in the form of an exogenous change that is equal in value to the amount of explicit support received. As BellSouth has previously presented to the Commission in this proceeding, the recovery of non-traffic sensitive loop costs from carriers in the form of carrier common line (“CCL”) charges and presubscribed interexchange carrier charges (“PICCs”) constitute implicit support that the Commission should make explicit.

26. Accordingly, for price cap carriers, the interstate access charges would be reduced by first reducing the price-cap index (“PCI”) for common line basket through an exogenous change. The reduction in the PCI would be reflected in reduced CCL charges and PICCs. The

¹⁷ *FNPRM* ¶ 124.

¹⁸ Making existing implicit support explicit is a statutory goal that is separate and distinct from ensuring reasonably comparable intrastate rates. *See e.g.*, *FNPRM* ¶ 41. The forward-looking cost methodology and hold-harmless mechanism are for the purpose of ensuring reasonably comparable intrastate rates.

Commission is correct in its view that reductions of the primary subscriber line charge would be counterproductive and leave implicit support in interstate access charges unaffected.¹⁹

27. An essential corollary to removing implicit support is to permit deaveraging of subscriber line charges. As the Commission has recognized, rate structure conventions such as study area wide average prices can be a form of implicit support between low-cost and high-cost serving areas within a study area. The Commission should move immediately to implement zone pricing for subscriber line charges. The deaveraging of subscriber line charges could parallel deaveraged UNE rate relationships.²⁰

28. BellSouth's approach for deaveraging subscriber line charges also serves to direct more support to high cost areas.²¹ Common line costs most directly affect universal service in that they represent the costs of an end user connecting to the public switched network. From a cost-causative perspective, there can be little debate that the end user should be responsible for these costs. Nonetheless, the Commission's access charge rules have insulated the end user from bearing this cost responsibility. Under BellSouth's proposed methodology, the amount an end user should be charged for the connection is determined and differentiated between high and low cost areas through the use of zones. The Commission, exercising its policy-making responsibilities, determines the maximum charge for end users through the cap on subscriber line charges. To the extent that the subscriber line charge cap is less than the full cost per line on a deaveraged basis, the difference is an amount that must be supported and such support should be

¹⁹ *FNPRM* ¶ 133.

²⁰ In comments filed in response to the *FNPRM*, USTA outlines a methodology for deaveraging subscriber line charges. BellSouth supports the approach suggested by USTA.

²¹ *See FNPRM* ¶ 135.

explicit. By calculating deaveraged subscriber line charges that would recover the full cost per line, such deaveraging will result in explicit support being targeted to high cost areas.

III. CONCLUSION

29. In creating a new explicit federal universal service support mechanism, the Commission should not be exclusively concerned with limiting the size of the fund. Constraining the fund to levels equivalent to the existing high cost fund does not necessarily equate to the Commission fulfilling its statutory responsibility to maintain affordable and reasonably comparable intrastate rates. The Commission should implement the new federal mechanism in a way that the fund's components and elements collectively make sense. The Commission can always fine-tune the mechanism in the future.

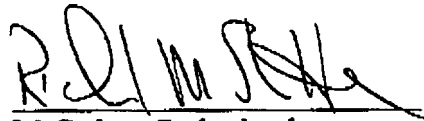
30. The Commission must continue its efforts to remove implicit subsidies that are contained in interstate access charges. BellSouth has provided a methodology that could be used

to modify the recovery of common line costs, the primary source of implicit subsidy. BellSouth urges the Commission to conclude expeditiously its access charge reform considerations so that interstate access charges of incumbent LECs no longer have to bear the burden of universal service support.

Respectfully submitted,

BELLSOUTH CORPORATION

By:



M. Robert Sutherland
Richard M. Sbaratta

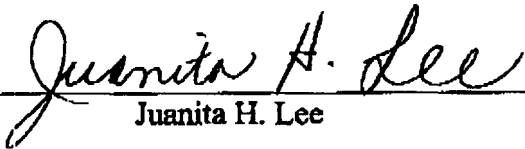
Its Attorneys

Suite 1700
1155 Peachtree Street, N. E.
Atlanta, Georgia 30309-3610
(404) 249-3386

Dated: July 23, 1999

CERTIFICATE OF SERVICE

I do hereby certify that I have this 23rd day of July 1998 served the following parties to this action with a copy of the foregoing COMMENTS by hand delivery or by placing a true and correct copy of the same in the United States Mail, postage prepaid, addressed to the parties listed on the attached service list.



Juanita H. Lee

SERVICE LIST CC DOCKET NOS. 96-45 and 96-262

*The Honorable Susan Ness, Chair,
Commissioner
Federal Communications Commission
The Portals, 445 Twelfth Street, S. W.
Room 8-B115
Washington, D.C. 20554

The Honorable Patrick H. Wood, III,
Chairman
Texas Public Utility Commission
1701 North Congress Ave.
Austin, Texas 78701

*The Honorable Harold Furchtgott-Roth,
Commissioner
Federal Communications Commission
The Portals, 445 Twelfth Street, S. W.
Room 8-A302
Washington, D.C. 20554

Martha S. Hogerty
Missouri Office Public Council
301 West High Street, Suite 250
Truman Building
Jefferson City, MO 65102

*The Honorable Gloria Tristani,
Commissioner
Federal Communications Commission
The Portals, 445 Twelfth Street, S. W.
Room 8-C302
Washington, D.C. 20554

Charles Bolle
South Dakota Public Utilities Commission
State Capitol, 500 East Capitol Street
Pierre, SD 57501-5070

The Honorable Julia Johnson, State Chair,
Chairman
Florida Public Service Commission
2540 Shumard Oak Blvd.
Gerald Gunter Building
Tallahassee, FL 32399-0850

Deonne Bruning
Nebraska Public Service Commission
300 The Atrium, 1200 N Street
P.O. Box 94927
Lincoln, NE 68509-4927

The Honorable David Baker,
Commissioner
Georgia Public Service Commission
244 Washington Street, S.W.
Atlanta, Georgia 30334-5701

*James Casserly
Federal Communications Commission
Commissioner Ness' Office
The Portals, 445 Twelfth Street, S. W.
Room 8-B115
Washington, D.C. 20554

The Honorable Laska Schoenfelder,
Commissioner
South Dakota Public Utilities Commission
State Capitol, 500 East Capitol Street
Pierre, SD 57501-5070

Rowland Curry
Texas Public Utility Commission
1701 North Congress Avenue
P.O. Box 13326
Austin, TX 78701

Ann Dean
Maryland Public Service Commission
16th Floor, 6 Saint Paul Street
Baltimore, MD 21202-6806

Bridget Duff, State Staff Chair
Florida Public Service Commission
2540 Sumard Oak Blvd.
Tallahassee, FL 32399-0866

Barry Payne
Indiana Office of the Consumer Counsel
100 North Senate Avenue, Room N501
Indianapolis, IN 46204-2208

*Irene Flannery, Federal Staff Chair
Federal Communications Commission
Accounting and Audits Division
Universal Service Branch
2100 M Street, N.W., Room 8922
Washington, D.C. 20554

James Bradford Ramsey
National Association of Regulatory Utility
Commissioners
1100 Pennsylvania Ave., N.W.
P.O. Box 684
Washington, D.C. 20044-0684

*Paul Gallant
Federal Communications Commission
Commissioner Tristani's Office
The Portals, 445 Twelfth Street, S. W.
Room 8-C302
Washington, D.C. 20554

Brian Roberts
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

The Honorable James M. Posey, Commissioner
Alaska Public Utilities Commission
1016 West Sixth Avenue, Suite 400
Anchorage, AK 99501-1963

Mark Long
Florida Public Service Commission
2540 Shumard Oak Blvd.
Tallahassee, FL 32399-0866

*Sheryl Todd
Federal Communications Commission
Universal Service Branch
The Portals, 445 Twelfth Street, S.W.
Room 5-A523
Washington, D.C. 20554

Sandra Makeef
Iowa Utilities Board
Lucas State Office Building
Des Moines, IA 50319

*Kevin Martin
Federal Communications Commission
Commissioner Furchtgott-Roth's Office
The Portals, 445 Twelfth Street, S. W.
Room 8-A302E
Washington, D.C. 20554

Philip F. McClelland
Pennsylvania Office of Consumer Advocate
1425 Strawberry Square
Harrisburg, PA 17120

*Magalie Roman Salas, Secretary
Federal Communications Commission
The Portals, 445 Twelfth Street, S.W.
Room TW-A325
Washington, DC 20554

Mark C. Rosenblum
Peter H. Jacoby
AT&T Corporation
Room 3245H1
295 North Maple Avenue
Basking Ridge, NJ 07920

*International Transcription Service
1231 20th Street, N.W.
Washington, DC 20036

David L. Lawson
James P. Young
Scott M. Bohannon
AT&T Corporation
1722 I Street, N. W.
Washington, D. C. 20006

*** VIA HAND DELIVERY**

Exhibit 1

Calculation of Universal Service Support Based on Various Methodologies

BellSouth has taken the cost model results provided by the FCC and calculated how much universal service support would be provided to each study area based on various benchmarks and levels of disaggregation. The following calculations were done:

Table 1: Summary of results which illustrate fund size variations based on selection of the cost benchmark.

Table 2: Support was calculated for each study area based on study area average costs compared to a nationwide benchmark. Calculations are shown based on benchmarks of 125%, 150% and 175%. If the support calculated was less than the current support, then the support for that study area was raised to the current level of support (i.e.-the 'Hold Harmless' concept was incorporated).

Table 3: Support was calculated for each study area based on wire center costs compared to a nationwide benchmark. As was expected, calculating the fund size at the wire center level results in a larger fund size than calculating the fund size at the study area level, if the benchmarks are held the same. This problem can be largely countered by simply raising the benchmark. Calculations are shown based on benchmarks of 200%, 225%, and 250% of the nationwide average cost. The 'Hold Harmless' concept was again factored into the calculations.

Table 4: Support was calculated for each study area based on wire center costs compared to a nationwide benchmark. However, only 25% of the cost above the benchmark is funded by the federal fund¹. Calculations were done based on benchmarks of 200%, 225%, and 250%, and the 'Hold Harmless' concept was incorporated into the calculations.

Conclusions:

- Concerns regarding the size of the fund can be addressed by simply raising the benchmark and/or only providing a percentage of the support above the benchmark. Such an approach is much preferable to using study area wide average calculations to limit the fund size.
- The use of unbundled element zones would result in a lower fund size than results from the use of wire centers (if the benchmark were held constant). BellSouth did not have the data to calculate exactly how large the fund would be based on unbundled element zones.

¹ There is nothing special about the use of 25%. Any percentage could be used to fine-tune the fund size.

Table 1

**SUMMARY OF THE EFFECT OF VARIOUS
BENCHMARKS ON THE SIZE OF THE FEDERAL USF**

| Methodology* | Study Area Fund | Wire Center Fund |
|--|------------------------|-------------------------|
| <u>100% support above Benchmark</u> | | |
| 125% Benchmark | \$1,869.7M | |
| 150% Benchmark | \$ 964.0M | |
| 175% Benchmark | \$ 490.4M | |
| 200% Benchmark | | \$2,060.4M |
| 225% Benchmark | | \$1,635.0M |
| 250% Benchmark | | \$1,310.3M |
| <u>25%** Support above Benchmark</u> | | |
| 200% Benchmark | | \$ 535.8M |
| 225% Benchmark | | \$ 433.9M |
| 250% Benchmark | | \$ 356.2M |

* The "hold-harmless" concept is included in these calculations.

**25% was used as an example. Any % could be used to fine-tune the fund size.

Table 2 - Support by Study Area based on Study Area Average Costs

| State | Study Area | All Switched Lines | Current Support | Avg Monthly Cost per Line | 100% Support Above 125% of Benchmark | | 100% Support Above 150% of Benchmark | | 100% Support Above 175% of Benchmark | |
|-------|--|--------------------|-----------------|---------------------------|--------------------------------------|---------------------------------|--------------------------------------|-----------------------------|--------------------------------------|-----------------------------|
| | | | | | Annual \$ | Support including Hold Harmless | Annual \$ | Support incl. Hold Harmless | Annual \$ | Support incl. Hold Harmless |
| AL | Contel Of The South DbA GTE South | 118,851 | 4,359,444 | 57.20 | 45,671,361 | 45,671,361 | 38,489,768 | 38,489,768 | 31,308,175 | 31,308,175 |
| AL | GTE And Contel Of Alabama | 155,511 | 7,099,392 | 43.07 | 33,390,404 | 33,390,404 | 23,993,624 | 23,993,624 | 14,596,844 | 14,596,844 |
| AL | South Central Bell-Al | 1,801,778 | - | 28.86 | 79,627,954 | 79,627,954 | - | - | - | - |
| AR | Southwestern Bell-Arkansas | 898,814 | 3,984,924 | 26.95 | 19,121,458 | 19,121,458 | - | 3,984,924 | - | 3,984,924 |
| AZ | Mountain Bell-Arizona | 2,389,011 | 2,417,928 | 17.94 | - | 2,417,928 | - | 2,417,928 | - | 2,417,928 |
| CA | Contel Of California - California | 321,289 | 154,140 | 35.05 | 38,064,425 | 38,064,425 | 18,650,479 | 18,650,479 | - | 154,140 |
| CA | GTE Of California | 3,806,227 | - | 15.89 | - | - | - | - | - | - |
| CA | Pacific Bell | 16,006,055 | - | 15.60 | - | - | - | - | - | - |
| CA | Roseville Telephone Company | 102,593 | 6,196,488 | 17.46 | - | 6,196,488 | - | 6,196,488 | - | 6,196,488 |
| CO | Mountain Bell-Colorado | 2,384,889 | 2,505,660 | 20.40 | - | 2,505,660 | - | 2,505,660 | - | 2,505,660 |
| CT | Southern New England Tel | 2,099,704 | - | 18.97 | - | - | - | - | - | - |
| DC | C And P Telephone Company Of DC | 923,018 | - | 11.65 | - | - | - | - | - | - |
| DE | Diamond State Tel Co | 500,823 | - | 18.96 | - | - | - | - | - | - |
| FL | GTE Florida Inc | 2,090,129 | - | 17.04 | - | - | - | - | - | - |
| FL | Southern Bell-Fl | 5,761,947 | - | 17.12 | - | - | - | - | - | - |
| FL | Sprint-FL | 1,812,228 | - | 21.82 | - | - | - | - | - | - |
| GA | Southern Bell-Ga | 3,598,169 | 2,980,956 | 21.36 | - | 2,980,956 | - | 2,980,956 | - | 2,980,956 |
| HI | GTE Hawaiian Telephone Co Inc | 613,082 | - | 16.23 | - | - | - | - | - | - |
| IA | Northwestern Bell-Ia | 1,055,858 | - | 21.04 | - | - | - | - | - | - |
| ID | Mountain Bell-Idaho | 472,339 | - | 25.25 | 412,871 | 412,871 | - | - | - | - |
| IL | Contel Of Illinois Inc DbA GTE - Illinois | 180,217 | - | 48.86 | 51,216,608 | 51,216,608 | 40,326,963 | 40,326,963 | 29,437,318 | 29,437,318 |
| IL | GTE Of Illinois | 625,893 | - | 35.10 | 74,527,645 | 74,527,645 | 36,707,947 | 36,707,947 | - | - |
| IL | Illinois Bell Tel Co | 6,264,639 | - | 15.67 | - | - | - | - | - | - |
| IN | Contel Of Indiana Inc DbA GTE - Indiana | 164,194 | - | 45.79 | 40,614,059 | 40,614,059 | 30,692,607 | 30,692,607 | 20,771,155 | 20,771,155 |
| IN | GTE Of Indiana | 689,074 | - | 26.69 | 12,509,517 | 12,509,517 | - | - | - | - |
| IN | Indiana Bell Tel Co | 1,871,463 | - | 20.53 | - | - | - | - | - | - |
| KS | Southwestern Bell-Kansas | 1,239,765 | - | 22.86 | - | - | - | - | - | - |
| KY | Cincinnati Bell-Ky | 181,349 | - | 24.33 | - | - | - | - | - | - |
| KY | GTE South Inc - Kentucky | 416,296 | 664,404 | 31.33 | 30,736,840 | 30,736,840 | 5,582,079 | 5,582,079 | - | 664,404 |
| KY | South Central Bell-Ky | 1,122,188 | 867,252 | 29.45 | 57,539,178 | 57,539,178 | - | 867,252 | - | 867,252 |
| LA | South Central Bell-La | 2,130,620 | - | 24.11 | - | - | - | - | - | - |
| MA | New England Tel-Ma | 4,109,503 | - | 16.23 | - | - | - | - | - | - |
| MD | C And P Tel Co Of Md | 3,332,491 | - | 17.88 | - | - | - | - | - | - |
| ME | New England Tel-Maine | 629,415 | - | 29.40 | 31,895,038 | 31,895,038 | - | - | - | - |
| MI | GTE North Inc-Mi | 658,734 | 772,320 | 37.62 | 98,358,273 | 98,358,273 | 58,554,153 | 58,554,153 | 18,750,032 | 18,750,032 |
| MI | Michigan Bell Tel Co | 4,932,029 | - | 19.10 | - | - | - | - | - | - |
| MN | Contel Of Minnesota Inc DbA GTE Minnesota | 116,134 | - | 64.41 | 54,675,202 | 54,675,202 | 47,657,784 | 47,657,784 | 40,640,366 | 40,640,366 |
| MN | Northwestern Bell-Minnesota | 2,103,813 | - | 20.53 | - | - | - | - | - | - |
| MO | Contel Missouri DbA GTE Missouri | 234,135 | 2,503,020 | 55.15 | 84,212,295 | 84,212,295 | 70,064,645 | 70,064,645 | 55,916,996 | 55,916,996 |
| MO | GTE North Inc - Missouri | 119,610 | 6,465,756 | 38.50 | 19,122,541 | 19,122,541 | 11,895,085 | 11,895,085 | 4,667,629 | 6,465,756 |
| MO | Southwestern Bell-Missouri | 2,368,354 | - | 21.38 | - | - | - | - | - | - |
| MS | South Central Bell-Mississippi | 1,224,211 | 7,339,776 | 38.34 | 193,369,145 | 193,369,145 | 119,395,975 | 119,395,975 | 45,422,804 | 45,422,804 |
| MT | Mountain Bell-Montana | 336,539 | 1,762,620 | 29.95 | 19,274,968 | 19,274,968 | - | 1,762,620 | - | 1,762,620 |
| NC | Carolina Tel And Tel Co | 1,045,627 | - | 33.03 | 98,533,718 | 98,533,718 | 35,351,518 | 35,351,518 | - | - |
| NC | Central Tel Co-Nc | 245,861 | - | 31.99 | 20,100,144 | 20,100,144 | 5,243,949 | 5,243,949 | - | - |
| NC | Contel Of North Carolina DbA GTE No Carolina | 126,022 | 4,430,112 | 42.89 | 26,786,493 | 26,786,493 | 19,171,591 | 19,171,591 | 11,556,688 | 11,556,688 |
| NC | GTE South Inc - North Carolina | 188,843 | 40,596 | 20.16 | - | 40,596 | - | 40,596 | - | 40,596 |
| NC | North State Tel Co-Nc | 111,211 | 2,469,732 | 20.35 | - | 2,469,732 | - | 2,469,732 | - | 2,469,732 |

Table 2 - Support by Study Area based on Study Area Average Costs

| State | Study Area | All Switched Lines | Current Support | Avg Monthly Cost per Line | 100% Support Above 125% of Benchmark | | 100% Support Above 150% of Benchmark | | 100% Support Above 175% of Benchmark | |
|-------|---|--------------------|-----------------|---------------------------|--------------------------------------|---------------------------------|--------------------------------------|-----------------------------|--------------------------------------|-----------------------------|
| | | | | | Annual \$ | Support including Hold Harmless | Annual \$ | Support incl. Hold Harmless | Annual \$ | Support incl. Hold Harmless |
| NC | Southern Bell-Nc | 2,166,681 | 1,786,068 | 21.47 | - | 1,786,068 | - | 1,786,068 | - | 1,786,068 |
| ND | Northwestern Bell-North Dakota | 243,342 | - | 24.37 | - | - | - | - | - | - |
| NE | Aliant | 259,554 | - | 31.25 | 18,914,764 | 18,914,764 | 3,231,167 | 3,231,167 | - | - |
| NE | Northwestern Bell-Nebraska | 518,839 | - | 25.19 | 79,952 | 79,952 | - | - | - | - |
| NH | New England Tel-Nh | 708,389 | - | 23.61 | - | - | - | - | - | - |
| NJ | New Jersey Bell | 5,623,659 | - | 14.99 | - | - | - | - | - | - |
| NM | Mountain Bell-New Mexico | 742,394 | 4,603,776 | 23.55 | - | 4,603,776 | - | 4,603,776 | - | 4,603,776 |
| NV | Central Telephone Company - Nevada | 730,274 | - | 14.31 | - | - | - | - | - | - |
| NV | Nevada Bell | 308,886 | - | 23.74 | - | - | - | - | - | - |
| NY | New York Tel | 10,765,482 | - | 16.03 | - | - | - | - | - | - |
| NY | Rochester Telephone Corp | 527,349 | - | 18.74 | - | - | - | - | - | - |
| OH | Cincinnati Bell-Ohio | 747,459 | - | 17.23 | - | - | - | - | - | - |
| OH | GTE North Inc-Oh | 817,983 | - | 36.17 | 107,903,490 | 107,903,490 | 58,476,720 | 58,476,720 | 9,049,950 | 9,049,950 |
| OH | Ohio Bell Tel Co | 3,776,240 | - | 17.58 | - | - | - | - | - | - |
| OH | United Tel Co Of Ohio | 554,151 | - | 31.90 | 44,705,632 | 44,705,632 | 11,220,958 | 11,220,958 | - | - |
| OK | GTE Southwest Inc - Oklahoma | 107,886 | - | 34.16 | 11,629,474 | 11,629,474 | 5,110,443 | 5,110,443 | - | - |
| OK | Southwestern Bell-Oklahoma | 1,519,540 | - | 24.69 | - | - | - | - | - | - |
| OR | GTE Of The Northwest | 430,850 | - | 23.55 | - | - | - | - | - | - |
| OR | Pacific Northwest Bell-Oregon | 1,258,768 | 17,076 | 19.87 | - | 17,076 | - | 17,076 | - | 17,076 |
| PA | Bell Of Pennsylvania | 5,842,150 | - | 17.61 | - | - | - | - | - | - |
| PA | GTE North Inc-Pa And Contel | 502,560 | - | 26.42 | 7,495,229 | 7,495,229 | - | - | - | - |
| RI | New England Tel-Ri | 624,292 | - | 17.22 | - | - | - | - | - | - |
| SC | GTE South Inc - South Carolina | 175,291 | - | 28.96 | 7,957,177 | 7,957,177 | - | - | - | - |
| SC | Southern Bell-Sc | 1,335,219 | 5,578,296 | 24.66 | - | 5,578,296 | - | 5,578,296 | - | 5,578,296 |
| SD | Northwestern Bell-South Dakota | 262,654 | - | 27.30 | 6,690,874 | 6,690,874 | - | - | - | - |
| TN | South Central Bell-Tn | 2,470,701 | - | 24.96 | - | - | - | - | - | - |
| TN | United Inter-Mountain Tel Co-Tn | 232,393 | - | 26.58 | 3,912,127 | 3,912,127 | - | - | - | - |
| TX | Central Telephone Company Of Texas | 185,248 | 5,150,976 | 30.64 | 12,143,766 | 12,143,766 | 950,122 | 5,150,976 | - | 5,150,976 |
| TX | Contel Of Texas Inc DbA GTE Texas | 223,812 | 495,768 | 63.37 | 102,576,195 | 102,576,195 | 89,052,315 | 89,052,315 | 75,528,434 | 75,528,434 |
| TX | GTE Southwest Inc - Texas | 1,506,518 | - | 27.08 | 34,399,980 | 34,399,980 | - | - | - | - |
| TX | Southwestern Bell-Texas | 8,528,179 | - | 19.07 | - | - | - | - | - | - |
| UT | Mountain Bell-Utah | 981,536 | - | 18.55 | - | - | - | - | - | - |
| VA | C And P Tel Co Of Va | 3,174,231 | - | 19.17 | - | - | - | - | - | - |
| VA | Central Tel Co Of Va | 263,787 | 1,263,000 | 41.96 | 53,125,145 | 53,125,145 | 37,185,768 | 37,185,768 | 21,246,391 | 21,246,391 |
| VA | Contel Of Virginia Inc DbA GTE Virginia | 483,713 | - | 32.58 | 42,970,208 | 42,970,208 | 13,741,763 | 13,741,763 | - | - |
| VA | United Inter-Mountain Tel Co-Va | 100,166 | - | 44.90 | 23,706,698 | 23,706,698 | 17,654,149 | 17,654,149 | 11,601,601 | 11,601,601 |
| VT | New England Tel-Vt | 313,359 | 1,454,568 | 31.47 | 23,663,022 | 23,663,022 | 4,728,248 | 4,728,248 | - | 1,454,568 |
| WA | GTE Northwest Inc - Washington | 677,548 | - | 21.91 | - | - | - | - | - | - |
| WA | Pacific Northwest Bell-Washington | 2,250,796 | - | 18.33 | - | - | - | - | - | - |
| WI | GTE North Inc-Wi | 456,649 | - | 44.26 | 104,569,926 | 104,569,926 | 76,976,828 | 76,976,828 | 49,383,730 | 49,383,730 |
| WI | Wisconsin Bell | 2,005,228 | - | 18.75 | - | - | - | - | - | - |
| WV | C And P Tel Co Of W Va | 773,859 | 1,673,112 | 34.03 | 82,210,213 | 82,210,213 | 35,449,644 | 35,449,644 | - | 1,673,112 |
| WY | Mountain Bell-Wyoming | 225,950 | 4,445,856 | 33.55 | 22,702,123 | 22,702,123 | 9,049,053 | 9,049,053 | - | 4,445,856 |
| | Average/Total | 149,084,110 | 83,483,016 | 20.14 | 1,841,116,132 | 1,869,712,708 | 924,605,344 | 964,017,570 | 439,878,112 | 490,430,667 |

Table 3 - Support by Study Area Based on Wire Center Cost Calculations

| State | Study Area | All Switched Lines | Current Support | Avg Monthly Cost per Line | 100% Support Above 200% of Benchmark | | 100% Support Above 225% of Benchmark | | 100% Support Above 250% of Benchmark | |
|-------|--|--------------------|-----------------|---------------------------|--------------------------------------|-----------------------------|--------------------------------------|-----------------------------|--------------------------------------|-----------------------------|
| | | | | | Annual \$ | Support incl. Hold Harmless | Annual \$ | Support incl. Hold Harmless | Annual \$ | Support incl. Hold Harmless |
| AL | Contel Of The South DbA Gte South | 118,851 | 4,359,444 | \$ 57.34 | 27,794,561 | 27,794,561 | 23,205,114 | 23,205,114 | 19,506,920 | 19,506,920 |
| AL | Gte And Contel Of Alabama | 155,511 | 7,099,392 | \$ 42.95 | 18,904,178 | 18,904,178 | 15,964,121 | 15,964,121 | 13,363,114 | 13,363,114 |
| AL | South Central Bell-Al | 1,801,778 | - | \$ 28.69 | 46,640,998 | 46,640,998 | 32,249,837 | 32,249,837 | 22,848,300 | 22,848,300 |
| AR | Southwestern Bell-Arkansas | 898,814 | 3,984,924 | \$ 26.69 | 27,481,680 | 27,481,680 | 23,102,701 | 23,102,701 | 20,107,600 | 20,107,600 |
| AZ | Mountain Bell-Arizona | 2,389,011 | 2,417,928 | \$ 17.94 | 17,796,525 | 17,796,525 | 14,521,222 | 14,521,222 | 12,106,008 | 12,106,008 |
| CA | Contel Of California-California | 321,289 | 154,140 | \$ 35.13 | 32,588,630 | 32,588,630 | 29,590,277 | 29,590,277 | 27,076,627 | 27,076,627 |
| CA | Gte Of California | 3,806,227 | - | \$ 15.90 | 8,569,500 | 8,569,500 | 7,489,331 | 7,489,331 | 6,468,945 | 6,468,945 |
| CA | Pacific Bell | 16,006,055 | - | \$ 15.53 | 43,447,787 | 43,447,787 | 35,796,657 | 35,796,657 | 30,293,481 | 30,293,481 |
| CA | Roseville Telephone Company | 102,593 | 6,196,488 | \$ 17.52 | - | 6,196,488 | - | 6,196,488 | - | 6,196,488 |
| CO | Mountain Bell-Colorado | 2,384,889 | 2,505,660 | \$ 20.26 | 25,218,893 | 25,218,893 | 20,610,199 | 20,610,199 | 17,243,910 | 17,243,910 |
| CT | Southern New England Tel | 2,099,704 | - | \$ 19.03 | 1,864,688 | 1,864,688 | 1,012,960 | 1,012,960 | 474,617 | 474,617 |
| DC | C And P Telephone Company Of Wa Dc | 923,018 | - | \$ 11.80 | - | - | - | - | - | - |
| DE | Diamond State Tel Co | 500,823 | - | \$ 18.91 | 1,016,426 | 1,016,426 | 592,599 | 592,599 | 451,012 | 451,012 |
| FL | Gte Florida Inc | 2,090,129 | - | \$ 17.06 | 2,260,730 | 2,260,730 | 1,754,716 | 1,754,716 | 1,354,784 | 1,354,784 |
| FL | Southern Bell-Fl | 5,761,947 | - | \$ 17.15 | 11,720,609 | 11,720,609 | 7,984,364 | 7,984,364 | 5,310,975 | 5,310,975 |
| FL | Sprint-FL | 1,812,228 | - | \$ 21.86 | 3,779,683 | 3,779,683 | 2,167,933 | 2,167,933 | 1,576,500 | 1,576,500 |
| GA | Southern Bell-Ga | 3,598,169 | 2,980,956 | \$ 21.09 | 29,237,141 | 29,237,141 | 19,709,157 | 19,709,157 | 13,802,889 | 13,802,889 |
| HI | Gte Hawaiian Telephone Co Inc | 613,082 | - | \$ 16.34 | 3,729,441 | 3,729,441 | 2,994,590 | 2,994,590 | 2,381,447 | 2,381,447 |
| IA | Northwestern Bell-Ia | 1,055,858 | - | \$ 20.75 | 10,175,725 | 10,175,725 | 7,911,265 | 7,911,265 | 6,079,757 | 6,079,757 |
| ID | Mountain Bell-Idaho | 472,339 | - | \$ 24.98 | 14,348,858 | 14,348,858 | 11,875,374 | 11,875,374 | 10,256,038 | 10,256,038 |
| IL | Contel Of Illinois Inc DbA Gte - Illinois | 180,217 | - | \$ 49.03 | 33,881,400 | 33,881,400 | 28,922,909 | 28,922,909 | 24,687,314 | 24,687,314 |
| IL | Gte Of Illinois | 625,893 | - | \$ 34.93 | 44,580,751 | 44,580,751 | 36,884,930 | 36,884,930 | 30,249,075 | 30,249,075 |
| IL | Illinois Bell Tel Co | 6,264,639 | - | \$ 15.64 | 11,284,077 | 11,284,077 | 9,154,435 | 9,154,435 | 7,400,003 | 7,400,003 |
| IN | Contel Of Indiana Inc DbA Gte - Indiana | 164,194 | - | \$ 45.50 | 19,637,596 | 19,637,596 | 15,343,856 | 15,343,856 | 12,076,190 | 12,076,190 |
| IN | Gte Of Indiana | 689,074 | - | \$ 26.65 | 21,440,242 | 21,440,242 | 17,054,426 | 17,054,426 | 13,406,073 | 13,406,073 |
| IN | Indiana Bell Tel Co | 1,871,463 | - | \$ 20.37 | 16,983,158 | 16,983,158 | 12,945,089 | 12,945,089 | 9,903,961 | 9,903,961 |
| KS | Southwestern Bell-Kansas | 1,239,765 | - | \$ 22.56 | 23,020,737 | 23,020,737 | 18,381,871 | 18,381,871 | 14,811,524 | 14,811,524 |
| KY | Cincinnati Bell-Ky | 181,349 | - | \$ 24.11 | 3,439,462 | 3,439,462 | 2,474,705 | 2,474,705 | 1,509,949 | 1,509,949 |
| KY | Gte South Inc - Kentucky | 416,296 | 664,404 | \$ 31.12 | 22,287,170 | 22,287,170 | 16,529,762 | 16,529,762 | 12,190,985 | 12,190,985 |
| KY | South Central Bell-Ky | 1,122,188 | 867,252 | \$ 29.25 | 48,291,648 | 48,291,648 | 35,729,863 | 35,729,863 | 25,490,649 | 25,490,649 |
| LA | South Central Bell-La | 2,130,620 | - | \$ 24.09 | 54,023,907 | 54,023,907 | 42,584,504 | 42,584,504 | 33,497,916 | 33,497,916 |
| MA | New England Tel-Ma | 4,109,503 | - | \$ 16.21 | 4,710,312 | 4,710,312 | 3,608,250 | 3,608,250 | 2,764,022 | 2,764,022 |
| MD | C And P Tel Co Of Md | 3,332,491 | - | \$ 17.87 | 10,153,603 | 10,153,603 | 6,864,356 | 6,864,356 | 4,625,725 | 4,625,725 |
| ME | New England Tel-Maine | 629,415 | - | \$ 29.54 | 24,726,199 | 24,726,199 | 18,724,633 | 18,724,633 | 14,654,055 | 14,654,055 |
| MI | Gte North Inc-Mi | 658,734 | 772,320 | \$ 37.63 | 43,800,153 | 43,800,153 | 31,420,542 | 31,420,542 | 21,899,045 | 21,899,045 |
| MI | Michigan Bell Tel Co | 4,932,029 | - | \$ 18.96 | 28,183,376 | 28,183,376 | 20,341,644 | 20,341,644 | 15,556,243 | 15,556,243 |
| MN | Contel Of Minnesota Inc DbA Gte Minnesota | 116,134 | - | \$ 64.64 | 38,441,805 | 38,441,805 | 34,158,142 | 34,158,142 | 30,328,086 | 30,328,086 |
| MN | Northwestern Bell-Minnesota | 2,103,813 | - | \$ 20.22 | 31,414,325 | 31,414,325 | 26,106,354 | 26,106,354 | 21,833,880 | 21,833,880 |
| MO | Contel Missouri DbA Gte Missouri | 234,135 | 2,503,020 | \$ 55.00 | 58,890,578 | 58,890,578 | 51,199,342 | 51,199,342 | 44,811,224 | 44,811,224 |
| MO | Gte North Inc - Missouri | 119,610 | 6,465,756 | \$ 38.49 | 14,198,591 | 14,198,591 | 12,064,848 | 12,064,848 | 10,020,397 | 10,020,397 |
| MO | Southwestern Bell-Missouri | 2,368,354 | - | \$ 21.17 | 38,121,728 | 38,121,728 | 31,202,093 | 31,202,093 | 25,402,109 | 25,402,109 |
| MS | South Central Bell-Mississippi | 1,224,211 | 7,339,776 | \$ 38.02 | 110,133,856 | 110,133,856 | 88,070,139 | 88,070,139 | 68,565,901 | 68,565,901 |
| MT | Mountain Bell-Montana | 336,539 | 1,762,620 | \$ 29.69 | 20,560,586 | 20,560,586 | 17,994,513 | 17,994,513 | 15,866,465 | 15,866,465 |
| NC | Carolina Tel And Tel Co | 1,045,627 | - | \$ 32.92 | 39,309,570 | 39,309,570 | 27,218,526 | 27,218,526 | 18,016,762 | 18,016,762 |
| NC | Central Tel Co-Nc | 245,861 | - | \$ 31.96 | 7,607,516 | 7,607,516 | 5,451,451 | 5,451,451 | 3,909,459 | 3,909,459 |
| NC | Contel Of North Carolina DbA Gte No Carolina | 126,022 | 4,430,112 | \$ 42.17 | 10,692,282 | 10,692,282 | 7,708,036 | 7,708,036 | 5,656,065 | 5,656,065 |

Table 3 - Support by Study Area Based on Wire Center Cost Calculations

| State | Study Area | All Switched Lines | Current Support | Avg Monthly Cost per Line | 100% Support Above 200% of Benchmark | | 100% Support Above 225% of Benchmark | | 100% Support Above 250% of Benchmark | |
|-------|---|--------------------|-----------------|---------------------------|--------------------------------------|-----------------------------|--------------------------------------|-----------------------------|--------------------------------------|-----------------------------|
| | | | | | Annual \$ | Support incl. Hold Harmless | Annual \$ | Support incl. Hold Harmless | Annual \$ | Support incl. Hold Harmless |
| NC | Gte South Inc - North Carolina | 188,843 | 40,596 | \$ 19.64 | 1,299,236 | 1,299,236 | 633,841 | 633,841 | 129,875 | 129,875 |
| NC | North State Tel Co-Nc | 111,211 | 2,469,732 | \$ 20.27 | - | 2,469,732 | - | 2,469,732 | - | 2,469,732 |
| NC | Southern Bell-Nc | 2,166,681 | 1,786,068 | \$ 21.29 | 11,509,094 | 11,509,094 | 7,193,375 | 7,193,375 | 4,569,136 | 4,569,136 |
| ND | Northwestern Bell-North Dakota | 243,342 | - | \$ 23.30 | 8,851,044 | 8,851,044 | 7,761,453 | 7,761,453 | 6,777,372 | 6,777,372 |
| NE | Aliant | 259,554 | - | \$ 31.49 | 24,816,466 | 24,816,466 | 22,213,134 | 22,213,134 | 19,795,237 | 19,795,237 |
| NE | Northwestern Bell-Nebraska | 518,839 | - | \$ 24.53 | 15,753,515 | 15,753,515 | 13,529,023 | 13,529,023 | 11,876,691 | 11,876,691 |
| NH | New England Tel-Nh | 708,389 | - | \$ 23.51 | 11,900,958 | 11,900,958 | 8,439,428 | 8,439,428 | 5,962,695 | 5,962,695 |
| NJ | New Jersey Bell | 5,623,659 | - | \$ 15.04 | 266,256 | 266,256 | 27,752 | 27,752 | - | - |
| NM | Mountain Bell-New Mexico | 742,394 | 4,603,776 | \$ 23.31 | 13,265,646 | 13,265,646 | 10,698,508 | 10,698,508 | 9,453,592 | 9,453,592 |
| NV | Central Telephone Company - Nevada | 730,274 | - | \$ 14.35 | 2,447,960 | 2,447,960 | 2,365,282 | 2,365,282 | 2,282,604 | 2,282,604 |
| NV | Nevada Bell | 308,886 | - | \$ 23.86 | 20,313,659 | 20,313,659 | 18,806,622 | 18,806,622 | 17,510,848 | 17,510,848 |
| NY | New York Tel | 10,765,482 | - | \$ 16.00 | 49,345,549 | 49,345,549 | 36,962,686 | 36,962,686 | 27,576,913 | 27,576,913 |
| NY | Rochester Telephone Corp | 527,349 | - | \$ 18.82 | 2,553,333 | 2,553,333 | 1,614,052 | 1,614,052 | 772,513 | 772,513 |
| OH | Cincinnati Bell-Ohio | 747,459 | - | \$ 17.28 | 496,667 | 496,667 | 340,397 | 340,397 | 282,017 | 282,017 |
| OH | Gte North Inc-Oh | 817,983 | - | \$ 36.16 | 50,822,116 | 50,822,116 | 38,056,137 | 38,056,137 | 28,115,282 | 28,115,282 |
| OH | Ohio Bell Tel Co | 3,776,240 | - | \$ 17.52 | 15,057,817 | 15,057,817 | 11,799,446 | 11,799,446 | 9,223,698 | 9,223,698 |
| OH | United Tel Co Of Ohio | 554,151 | - | \$ 31.73 | 22,257,521 | 22,257,521 | 16,102,101 | 16,102,101 | 11,143,047 | 11,143,047 |
| OK | Gte Southwest Inc - Oklahoma | 107,886 | - | \$ 34.23 | 8,401,738 | 8,401,738 | 6,762,832 | 6,762,832 | 5,513,273 | 5,513,273 |
| OK | Southwestern Bell-Oklahoma | 1,519,540 | - | \$ 24.42 | 37,896,882 | 37,896,882 | 30,969,667 | 30,969,667 | 25,745,248 | 25,745,248 |
| OR | Gte Of The Northwest | 430,850 | - | \$ 23.48 | 10,305,294 | 10,305,294 | 8,151,485 | 8,151,485 | 6,418,970 | 6,418,970 |
| OR | Pacific Northwest Bell-Oregon | 1,258,768 | 17,076 | \$ 19.64 | 9,360,210 | 9,360,210 | 6,982,939 | 6,982,939 | 5,401,549 | 5,401,549 |
| PA | Bell Of Pennsylvania | 5,842,150 | - | \$ 17.59 | 22,110,820 | 22,110,820 | 16,316,900 | 16,316,900 | 12,131,205 | 12,131,205 |
| PA | Gte North Inc-Pa And Contel | 502,560 | - | \$ 26.23 | 9,679,038 | 9,679,038 | 6,744,790 | 6,744,790 | 4,390,723 | 4,390,723 |
| RI | New England Tel-Ri | 624,292 | - | \$ 17.18 | 76,563 | 76,563 | 50,388 | 50,388 | 24,213 | 24,213 |
| SC | Gte South Inc - South Carolina | 175,291 | - | \$ 28.81 | 6,246,481 | 6,246,481 | 4,482,198 | 4,482,198 | 3,019,845 | 3,019,845 |
| SC | Southern Bell-Sc | 1,335,219 | 5,578,296 | \$ 24.55 | 10,962,135 | 10,962,135 | 6,614,407 | 6,614,407 | 4,096,940 | 5,578,296 |
| SD | Northwestern Bell-South Dakota | 262,654 | - | \$ 26.50 | 11,415,119 | 11,415,119 | 10,234,091 | 10,234,091 | 9,273,908 | 9,273,908 |
| TN | South Central Bell-Tn | 2,470,701 | - | \$ 24.74 | 41,344,076 | 41,344,076 | 29,384,572 | 29,384,572 | 20,856,538 | 20,856,538 |
| TN | United Inter-Mountain Tel Co-Tn | 232,393 | - | \$ 26.46 | 3,015,453 | 3,015,453 | 1,811,887 | 1,811,887 | 973,073 | 973,073 |
| TX | Central Telephone Company Of Texas | 185,248 | 5,150,976 | \$ 30.46 | 14,935,536 | 14,935,536 | 13,367,143 | 13,367,143 | 12,091,189 | 12,091,189 |
| TX | Contel Of Texas Inc DbA Gte Texas | 223,812 | 495,768 | \$ 63.49 | 73,283,585 | 73,283,585 | 64,876,187 | 64,876,187 | 57,613,507 | 57,613,507 |
| TX | Gte Southwest Inc - Texas | 1,506,518 | - | \$ 26.55 | 70,403,390 | 70,403,390 | 60,670,767 | 60,670,767 | 52,397,562 | 52,397,562 |
| TX | Southwestern Bell-Texas | 8,528,179 | - | \$ 18.96 | 68,340,061 | 68,340,061 | 50,713,739 | 50,713,739 | 39,954,112 | 39,954,112 |
| UT | Mountain Bell-Utah | 981,536 | - | \$ 18.50 | 7,565,880 | 7,565,880 | 6,447,093 | 6,447,093 | 5,632,555 | 5,632,555 |
| VA | C And P Tel Co Of Va | 3,174,231 | - | \$ 19.13 | 45,687,284 | 45,687,284 | 35,792,536 | 35,792,536 | 27,614,100 | 27,614,100 |
| VA | Central Tel Co Of Va | 263,787 | 1,263,000 | \$ 42.02 | 32,318,616 | 32,318,616 | 26,904,121 | 26,904,121 | 22,099,121 | 22,099,121 |
| VA | Contel Of Virginia Inc DbA Gte Virginia | 483,713 | - | \$ 32.46 | 36,208,649 | 36,208,649 | 29,147,855 | 29,147,855 | 23,443,067 | 23,443,067 |
| VA | United Inter-Mountain Tel Co-Va | 100,166 | - | \$ 44.95 | 12,926,679 | 12,926,679 | 10,413,750 | 10,413,750 | 8,297,773 | 8,297,773 |
| VT | New England Tel-Vt | 313,359 | 1,454,568 | \$ 31.19 | 18,447,264 | 18,447,264 | 14,813,179 | 14,813,179 | 11,450,076 | 11,450,076 |
| WA | Gte Northwest Inc - Washington | 677,548 | - | \$ 21.78 | 13,043,067 | 13,043,067 | 11,208,915 | 11,208,915 | 9,721,915 | 9,721,915 |
| WA | Pacific Northwest Bell-Washington | 2,250,796 | - | \$ 18.29 | 13,098,246 | 13,098,246 | 9,465,533 | 9,465,533 | 7,188,836 | 7,188,836 |
| WI | Gte North Inc-Wi | 456,649 | 0 | \$ 44.21 | 52,765,375 | 52,765,375 | 40,430,100 | 40,430,100 | 30,400,916 | 30,400,916 |
| WI | Wisconsin Bell | 2,005,228 | - | \$ 18.73 | 4,140,018 | 4,140,018 | 2,890,075 | 2,890,075 | 2,108,776 | 2,108,776 |
| WV | C And P Tel Co Of W Va | 773,859 | 1,673,112 | \$ 33.92 | 48,877,234 | 48,877,234 | 37,355,129 | 37,355,129 | 27,946,281 | 27,946,281 |
| WY | Mountain Bell-Wyoming | 225,950 | 4,445,856 | \$ 33.28 | 11,576,670 | 11,576,670 | 10,082,089 | 10,082,089 | 8,990,783 | 8,990,783 |
| | | | | | | | | | | |
| | | | | | | | | | | |
| | Average/Total | 149,084,110 | 83,483,016 | 20.06 | 2,051,778,883 | 2,060,445,103 | 1,626,299,244 | 1,634,965,464 | 1,300,103,574 | 1,310,251,150 |

Table 4 - Support by Study Area based on Wirecenter Level Calculations and 25% Factor

| State | Study Area | All Switched Lines | Current Support | Avg Monthly Cost per Line | 25% Support Above 200% of Benchmark | | 25% Support Above 225% of Benchmark | | 25% Support Above 250% of Benchmark | |
|-------|--|--------------------|-----------------|---------------------------|-------------------------------------|-----------------------------|-------------------------------------|-----------------------------|-------------------------------------|-----------------------------|
| | | | | | Annual \$ at 100% | Support incl. Hold Harmless | Annual \$ at 100% | Support incl. Hold Harmless | Annual \$ at 100% | Support incl. Hold Harmless |
| AL | Contel Of The South Dba Gte South | 118,851 | 4,359,444 | \$ 57.34 | 27,794,561 | 6,948,640 | 23,205,114 | 5,801,279 | 19,506,920 | 4,876,730 |
| AL | Gte And Contel Of Alabama | 155,511 | 7,099,392 | \$ 42.95 | 18,904,178 | 7,099,392 | 15,964,121 | 7,099,392 | 13,363,114 | 7,099,392 |
| AL | South Central Bell-Al | 1,801,778 | - | \$ 28.69 | 46,640,998 | 11,660,249 | 32,249,837 | 8,062,459 | 22,848,300 | 5,712,075 |
| AR | Southwestern Bell-Arkansas | 898,814 | 3,984,924 | \$ 26.69 | 27,481,680 | 6,870,420 | 23,102,701 | 5,775,675 | 20,107,600 | 5,026,900 |
| AZ | Mountain Bell-Arizona | 2,389,011 | 2,417,928 | \$ 17.94 | 17,796,525 | 4,449,131 | 14,521,222 | 3,630,305 | 12,106,008 | 3,026,502 |
| CA | Contel Of California-California | 321,289 | 154,140 | \$ 35.13 | 32,588,630 | 8,147,158 | 29,590,277 | 7,397,569 | 27,076,627 | 6,769,157 |
| CA | Gte Of California | 3,806,227 | - | \$ 15.90 | 8,569,500 | 2,142,375 | 7,489,331 | 1,872,333 | 6,468,945 | 1,617,236 |
| CA | Pacific Bell | 16,006,055 | - | \$ 15.53 | 43,447,787 | 10,861,947 | 35,796,657 | 8,949,164 | 30,293,481 | 7,573,370 |
| CA | Roseville Telephone Company | 102,593 | 6,196,488 | \$ 17.52 | - | 6,196,488 | - | 6,196,488 | - | 6,196,488 |
| CO | Mountain Bell-Colorado | 2,384,889 | 2,505,660 | \$ 20.26 | 25,218,893 | 6,304,723 | 20,610,199 | 5,152,550 | 17,243,910 | 4,310,978 |
| CT | Southern New England Tel | 2,099,704 | - | \$ 19.03 | 1,864,688 | 466,172 | 1,012,960 | 253,240 | 474,617 | 118,654 |
| DC | C And P Telephone Company Of Wa Dc | 923,018 | - | \$ 11.80 | - | - | - | - | - | - |
| DE | Diamond State Tel Co | 500,823 | - | \$ 18.91 | 1,016,426 | 254,106 | 592,599 | 148,150 | 451,012 | 112,753 |
| FL | Gte Floridainc | 2,090,129 | - | \$ 17.06 | 2,260,730 | 565,183 | 1,754,716 | 438,679 | 1,354,784 | 338,696 |
| FL | Southern Bell-Fl | 5,761,947 | - | \$ 17.15 | 11,720,609 | 2,930,152 | 7,984,364 | 1,996,091 | 5,310,975 | 1,327,744 |
| FL | Sprint-FL | 1,812,228 | - | \$ 21.86 | 3,779,683 | 944,921 | 1,576,933 | 541,983 | 1,576,500 | 394,125 |
| GA | Southern Bell-Ga | 3,598,169 | 2,980,956 | \$ 21.09 | 29,237,141 | 7,309,285 | 19,709,157 | 4,927,289 | 13,802,889 | 3,450,722 |
| HI | Gte Hawaiian Telephone Co Inc | 613,082 | - | \$ 16.34 | 3,729,441 | 932,360 | 2,994,590 | 748,647 | 2,381,447 | 595,362 |
| IA | Northwestern Bell-Ia | 1,055,858 | - | \$ 20.75 | 10,175,725 | 2,543,931 | 7,911,265 | 1,977,816 | 6,079,757 | 1,519,939 |
| ID | Mountain Bell-Idaho | 472,339 | - | \$ 24.98 | 14,348,858 | 3,587,214 | 11,875,374 | 2,968,844 | 10,256,038 | 2,564,009 |
| IL | Contel Of Illinois Inc Dba Gte - Illinois | 180,217 | - | \$ 49.03 | 33,881,400 | 8,470,350 | 28,922,909 | 7,230,727 | 24,687,314 | 6,171,828 |
| IL | Gte Of Illinois | 625,893 | - | \$ 34.93 | 44,580,751 | 11,145,188 | 36,884,930 | 9,221,232 | 30,249,075 | 7,562,269 |
| IL | Illinois Bell Tel Co | 6,264,639 | - | \$ 15.64 | 11,284,077 | 2,821,019 | 9,154,435 | 2,288,609 | 7,400,003 | 1,850,001 |
| IN | Contel Of Indiana Inc Dba Gte - Indiana | 164,194 | - | \$ 45.50 | 19,637,596 | 4,909,399 | 15,343,856 | 3,835,964 | 12,076,190 | 3,019,047 |
| IN | Gte Of Indiana | 689,074 | - | \$ 26.65 | 21,440,242 | 5,360,061 | 17,054,426 | 4,263,607 | 13,406,073 | 3,351,518 |
| IN | Indiana Bell Tel Co | 1,871,463 | - | \$ 20.37 | 16,983,158 | 4,245,789 | 12,945,089 | 3,236,272 | 9,903,961 | 2,475,990 |
| KS | Southwestern Bell-Kansas | 1,239,765 | - | \$ 22.56 | 23,020,737 | 5,755,184 | 18,381,871 | 4,595,468 | 14,811,524 | 3,702,881 |
| KY | Cincinnati Bell-Ky | 181,349 | - | \$ 24.11 | 3,439,462 | 859,865 | 2,474,705 | 618,676 | 1,509,949 | 377,487 |
| KY | Gte South Inc - Kentucky | 416,296 | 664,404 | \$ 31.12 | 22,287,170 | 5,571,793 | 16,529,762 | 4,132,440 | 12,190,985 | 3,047,746 |
| KY | South Central Bell-Ky | 1,122,188 | 867,252 | \$ 29.25 | 48,291,648 | 12,072,912 | 35,729,863 | 8,932,466 | 25,490,649 | 6,372,662 |
| LA | South Central Bell-La | 2,130,620 | - | \$ 24.09 | 54,023,907 | 13,505,977 | 42,584,504 | 10,646,126 | 33,497,916 | 8,374,479 |
| MA | New England Tel-Ma | 4,109,503 | - | \$ 16.21 | 4,710,312 | 1,177,578 | 3,608,250 | 902,063 | 2,764,022 | 691,005 |
| MD | C And P Tel Co Of Md | 3,332,491 | - | \$ 17.87 | 10,153,603 | 2,538,401 | 6,864,356 | 1,716,089 | 4,625,725 | 1,156,431 |
| ME | New England Tel-Maine | 629,415 | - | \$ 29.54 | 24,726,199 | 6,181,550 | 18,724,633 | 4,681,158 | 14,654,055 | 3,663,514 |
| MI | Gte North Inc-Mi | 658,734 | 772,320 | \$ 37.63 | 43,800,153 | 10,950,038 | 31,420,542 | 7,855,136 | 21,899,045 | 5,474,761 |
| MI | Michigan Bell Tel Co | 4,932,029 | - | \$ 18.96 | 28,183,376 | 7,045,844 | 20,341,644 | 5,085,411 | 15,556,243 | 3,889,061 |
| MN | Contel Of Minnesota Inc Dba Gte Minnesota | 116,134 | - | \$ 64.64 | 38,441,805 | 9,610,451 | 34,158,142 | 8,539,536 | 30,328,086 | 7,582,021 |
| MN | Northwestern Bell-Minnesota | 2,103,813 | - | \$ 20.22 | 31,414,325 | 7,853,581 | 26,106,354 | 6,526,589 | 21,833,880 | 5,458,470 |
| MO | Contel Missouri Dba Gte Missouri | 234,135 | 2,503,020 | \$ 55.00 | 58,890,578 | 14,722,645 | 51,199,342 | 12,799,836 | 44,811,224 | 11,202,806 |
| MO | Gte North Inc - Missouri | 119,610 | 6,465,756 | \$ 38.49 | 14,198,591 | 6,465,756 | 12,064,848 | 6,465,756 | 10,020,397 | 6,465,756 |
| MO | Southwestern Bell-Missouri | 2,368,354 | - | \$ 21.17 | 38,121,728 | 9,530,432 | 31,202,093 | 7,800,523 | 25,402,109 | 6,350,527 |
| MS | South Central Bell-Mississippi | 1,224,211 | 7,339,776 | \$ 38.02 | 110,133,856 | 27,533,464 | 88,070,139 | 22,017,535 | 68,565,901 | 17,141,475 |
| MT | Mountain Bell-Montana | 336,539 | 1,762,620 | \$ 29.69 | 20,560,586 | 5,140,147 | 17,994,513 | 4,498,628 | 15,866,465 | 3,966,616 |
| NC | Carolina Tel And Tel Co | 1,045,627 | - | \$ 32.92 | 39,309,570 | 9,827,393 | 27,218,526 | 6,804,631 | 18,016,762 | 4,504,191 |
| NC | Central Tel Co-Nc | 245,861 | - | \$ 31.96 | 7,607,516 | 1,901,879 | 5,451,451 | 1,362,863 | 3,909,459 | 977,365 |
| NC | Contel Of North Carolina Dba Gte No Carolina | 126,022 | 4,430,112 | \$ 42.17 | 10,692,282 | 4,430,112 | 7,708,036 | 4,430,112 | 5,656,065 | 4,430,112 |

Table 4 - Support by Study Area based on Wirecenter Level Calculations and 25% Factor

| State | Study Area | All Switched Lines | Current Support | Avg Monthly Cost per Line | 25% Support Above 200% of Benchmark | | 25% Support Above 225% of Benchmark | | 25% Support Above 250% of Benchmark | |
|---------------|---|--------------------|-----------------|---------------------------|-------------------------------------|-----------------------------|-------------------------------------|-----------------------------|-------------------------------------|-----------------------------|
| | | | | | Annual \$ at 100% | Support incl. Hold Harmless | Annual \$ at 100% | Support incl. Hold Harmless | Annual \$ at 100% | Support incl. Hold Harmless |
| NC | Gte South Inc - North Carolina | 188,843 | 40,596 | \$ 19.64 | 1,299,236 | 324,809 | 633,841 | 158,460 | 129,875 | 40,596 |
| NC | North State Tel Co-Nc | 111,211 | 2,469,732 | \$ 20.27 | - | 2,469,732 | - | 2,469,732 | - | 2,469,732 |
| NC | Southern Bell-Nc | 2,166,681 | 1,786,068 | \$ 21.29 | 11,509,094 | 2,877,274 | 7,193,375 | 1,798,344 | 4,569,136 | 1,786,068 |
| ND | Northwestern Bell-North Dakota | 243,342 | - | \$ 23.30 | 8,851,044 | 2,212,761 | 7,761,453 | 1,940,363 | 6,777,372 | 1,694,343 |
| NE | Aliant | 259,554 | - | \$ 31.49 | 24,816,466 | 6,204,117 | 22,213,134 | 5,553,284 | 19,795,237 | 4,948,809 |
| NE | Northwestern Bell-Nebraska | 518,839 | - | \$ 24.53 | 15,753,515 | 3,938,379 | 13,529,023 | 3,382,256 | 11,876,691 | 2,969,173 |
| NH | New England Tel-Nh | 708,389 | - | \$ 23.51 | 11,900,958 | 2,975,240 | 8,439,428 | 2,109,857 | 5,962,695 | 1,490,674 |
| NJ | New Jersey Bell | 5,623,659 | - | \$ 15.04 | 266,256 | 66,564 | 27,752 | 6,938 | - | - |
| NM | Mountain Bell-New Mexico | 742,394 | 4,603,776 | \$ 23.31 | 13,265,646 | 4,603,776 | 10,698,508 | 4,603,776 | 9,453,592 | 4,603,776 |
| NV | Central Telephone Company - Nevada | 730,274 | - | \$ 14.35 | 2,447,960 | 611,990 | 2,365,282 | 591,321 | 2,282,604 | 570,651 |
| NV | Nevada Bell | 308,886 | - | \$ 23.86 | 20,313,659 | 5,078,415 | 18,806,622 | 4,701,655 | 17,510,848 | 4,377,712 |
| NY | New York Tel | 10,765,482 | - | \$ 16.00 | 49,345,549 | 12,336,387 | 36,962,686 | 9,240,672 | 27,576,913 | 6,894,228 |
| NY | Rochester Telephone Corp | 527,349 | - | \$ 18.82 | 2,553,333 | 638,333 | 1,614,052 | 403,513 | 772,513 | 193,128 |
| OH | Cincinnati Bell-Ohio | 747,459 | - | \$ 17.28 | 496,667 | 124,167 | 340,397 | 85,099 | 282,017 | 70,504 |
| OH | Gte North Inc-Oh | 817,983 | - | \$ 36.16 | 50,822,116 | 12,705,529 | 38,056,137 | 9,514,034 | 28,115,282 | 7,028,820 |
| OH | Ohio Bell Tel Co | 3,776,240 | - | \$ 17.52 | 15,057,817 | 3,764,454 | 11,799,446 | 2,949,861 | 9,223,698 | 2,305,924 |
| OH | United Tel Co Of Ohio | 554,151 | - | \$ 31.73 | 22,257,521 | 5,564,380 | 16,102,101 | 4,025,525 | 11,143,047 | 2,785,762 |
| OK | Gte Southwest Inc - Oklahoma | 107,886 | - | \$ 34.23 | 8,401,738 | 2,100,434 | 6,762,832 | 1,690,708 | 5,513,273 | 1,378,318 |
| OK | Southwestern Bell-Oklahoma | 1,519,540 | - | \$ 24.42 | 37,896,882 | 9,474,220 | 30,969,667 | 7,742,417 | 25,745,248 | 6,436,312 |
| OR | Gte Of The Northwest | 430,850 | - | \$ 23.48 | 10,305,294 | 2,576,324 | 8,151,485 | 2,037,871 | 6,418,970 | 1,604,743 |
| OR | Pacific Northwest Bell-Oregon | 1,258,768 | 17,076 | \$ 19.64 | 9,360,210 | 2,340,052 | 6,982,939 | 1,745,735 | 5,401,549 | 1,350,387 |
| PA | Bell Of Pennsylvania | 5,842,150 | - | \$ 17.59 | 22,110,820 | 5,527,705 | 16,316,900 | 4,079,225 | 12,131,205 | 3,032,801 |
| PA | Gte North Inc-Pa And Contel | 502,560 | - | \$ 26.23 | 9,679,038 | 2,419,760 | 6,744,790 | 1,686,197 | 4,390,723 | 1,097,681 |
| RI | New England Tel-Ri | 624,292 | - | \$ 17.18 | 76,563 | 19,141 | 50,388 | 12,597 | 24,213 | 6,053 |
| SC | Gte South Inc - South Carolina | 175,291 | - | \$ 28.81 | 6,246,481 | 1,561,620 | 4,482,198 | 1,120,550 | 3,019,845 | 754,961 |
| SC | Southern Bell-Sc | 1,335,219 | 5,578,296 | \$ 24.55 | 10,962,135 | 5,578,296 | 6,614,407 | 5,578,296 | 4,096,940 | 5,578,296 |
| SD | Northwestern Bell-South Dakota | 262,654 | - | \$ 26.50 | 11,415,119 | 2,853,780 | 10,234,091 | 2,558,523 | 9,273,908 | 2,318,477 |
| TN | South Central Bell-Tn | 2,470,701 | - | \$ 24.74 | 41,344,076 | 10,336,019 | 29,384,572 | 7,346,143 | 20,856,538 | 5,214,135 |
| TN | United Inter-Mountain Tel Co-Tn | 232,393 | - | \$ 26.46 | 3,015,453 | 753,863 | 1,811,887 | 452,972 | 973,073 | 243,268 |
| TX | Central Telephone Company Of Texas | 185,248 | 5,150,976 | \$ 30.46 | 14,935,536 | 5,150,976 | 13,367,143 | 5,150,976 | 12,091,189 | 5,150,976 |
| TX | Contel Of Texas Inc DbA Gte Texas | 223,812 | 495,768 | \$ 63.49 | 73,283,585 | 18,320,896 | 64,876,187 | 16,219,047 | 57,613,507 | 14,403,377 |
| TX | Gte Southwest Inc - Texas | 1,506,518 | - | \$ 26.55 | 70,403,390 | 17,600,848 | 60,670,767 | 15,167,692 | 52,397,562 | 13,099,391 |
| TX | Southwestern Bell-Texas | 8,528,179 | - | \$ 18.96 | 68,340,061 | 17,085,015 | 50,713,739 | 12,678,435 | 39,954,112 | 9,988,528 |
| UT | Mountain Bell-Utah | 981,536 | - | \$ 18.50 | 7,565,880 | 1,891,470 | 6,447,093 | 1,611,773 | 5,632,555 | 1,408,139 |
| VA | C And P Tel Co Of Va | 3,174,231 | - | \$ 19.13 | 45,687,284 | 11,421,821 | 35,792,536 | 8,948,134 | 27,614,100 | 6,903,525 |
| VA | Central Tel Co Of Va | 263,787 | 1,263,000 | \$ 42.02 | 32,318,616 | 8,079,654 | 26,904,121 | 6,726,030 | 22,099,121 | 5,524,780 |
| VA | Contel Of Virginia Inc DbA Gte Virginia | 483,713 | - | \$ 32.46 | 36,208,649 | 9,052,162 | 29,147,855 | 7,286,964 | 23,443,067 | 5,860,767 |
| VA | United Inter-Mountain Tel Co-Va | 100,166 | - | \$ 44.95 | 12,926,679 | 3,231,670 | 10,413,750 | 2,603,438 | 8,297,773 | 2,074,443 |
| VT | New England Tel-Vt | 313,359 | 1,454,568 | \$ 31.19 | 18,447,264 | 4,611,816 | 14,813,179 | 3,703,295 | 11,450,076 | 2,862,519 |
| WA | Gte Northwest Inc - Washington | 677,548 | - | \$ 21.78 | 13,043,067 | 3,260,767 | 11,208,915 | 2,802,229 | 9,721,915 | 2,430,479 |
| WA | Pacific Northwest Bell-Washington | 2,250,796 | - | \$ 18.29 | 13,098,246 | 3,274,562 | 9,465,533 | 2,366,383 | 7,188,836 | 1,797,209 |
| WI | Gte North Inc-Wi | 456,649 | 0 | \$ 44.21 | 52,765,375 | 13,191,344 | 40,430,100 | 10,107,525 | 30,400,916 | 7,600,229 |
| WI | Wisconsin Bell | 2,005,228 | - | \$ 18.73 | 4,140,018 | 1,035,005 | 2,890,075 | 722,519 | 2,108,776 | 527,194 |
| WV | C And P Tel Co Of W Va | 773,859 | 1,673,112 | \$ 33.92 | 48,877,234 | 12,219,308 | 37,355,129 | 9,338,782 | 27,946,281 | 6,986,570 |
| WY | Mountain Bell-Wyoming | 225,950 | 4,445,856 | \$ 33.28 | 11,576,670 | 4,445,856 | 10,082,089 | 4,445,856 | 8,990,783 | 4,445,856 |
| Average/Total | | 149,084,110 | 83,483,016 | 20.06 | 2,051,778,883 | 535,751,345 | 1,626,299,244 | 433,890,407 | 1,300,103,574 | 356,200,169 |